

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case: 2:25-cr-20224

Assigned To : Edmunds, Nancy G.

Referral Judge: Grand, David R.

Assign. Date : 4/4/2025

Description: INFO USA V. RAFI (AB)

VIOLATIONS: 18 U.S.C. § 554 18 U.S.C. §
1001

Sarmad RAFI,

Defendant.

_____ /

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

18 U.S.C. § 554 – *Smuggling Goods from the United States*

On or about December 30, 2023, in the Eastern District of Michigan, Southern Division, the defendant, Sarmad RAFI, did knowingly export and send from the United States, any merchandise, article, and object, to wit: a Level IV body armor plate, which is a defense article as defined under the United States Munitions List, and did not obtain a license or written authorization for such export, contrary to any law or regulation of the United States, to wit: Title 22, United States Code, Sections 2778(b)(2) & 2778(c) and Title 22, Code of Federal Regulations, Part 121, 123 &

127, all of which constitutes a violation of Title 18, United States Code, Section 554.

COUNT TWO

18 U.S.C. § 554 – *Smuggling Goods from the United States*

On or about May 31, 2024, in the Eastern District of Michigan, Southern Division, the defendant, Sarmad RAFI, did knowingly export and send from the United States, any merchandise, article, and object, to wit: two Level IV body armor plates, which are defense articles as defined under the United States Munitions List, and did not obtain a license or written authorization for such export, contrary to any law or regulation of the United States, to wit: Title 22, United States Code, Sections 2778(b)(2) & 2778(c) and Title 22, Code of Federal Regulations, Part 121, 123 & 127, all of which constitutes a violation of Title 18, United States Code, Section 554.

COUNT THREE

18 U.S.C. § 554 – *Smuggling Goods from the United States*

On or about January 27, 2025, in the Eastern District of Michigan, Southern Division, the defendant, Sarmad RAFI, did knowingly attempt to export and send from the United States, any merchandise, article, or object, to wit: firearm components and ammunition, contrary to any law or regulation of the United States, all of which constitutes a violation of Title 18, United States Code, Section 554.

It is further alleged that the firearm components and ammunition are:

- Seven 3D Printed Pistol Frame Parts Set (FMDA DDXX.2 Glock

Compatible)

- 10.5-inch complete 5.56 pistol upper receiver with flash can
- VZ 61 Scorpion Parts Kit Complete Parts Kit, unissued with United States Made Barrel, 20-round magazine, holster, and cleaning kit
- Endcap/Adapter with stock interface for GHM9/45
- Seven-round shotgun card for 12-gauge shells
- Night vision goggle helmet mount adapter
- AR style upper receiver components
- One thousand (1,000) live rounds of .22 caliber ammunition

COUNT FOUR

18 U.S.C. § 1001(a)(2) – *False Statements*

On or about January 27, 2025, in the Eastern District of Michigan, Southern Division, the defendant, Sarmad RAFI, did knowingly and willfully make a materially false, fictitious, or fraudulent statement in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, all of which constitutes a violation of Title 18, United States Code, Section 1001(a)(2).

FORFEITURE ALLEGATION

Criminal Forfeiture - 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)

1. The allegations contained in Counts One through Three of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Sections 2461(c).

2. Upon conviction of one or more of the offenses alleged in Counts One through Three of this Information, defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) together with 28 U.S.C. § 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, from the smuggling offense(s). As part of the forfeiture in this case, the government intends to seek entry of a forfeiture money judgment.

3. If any of the property described above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

JULIE A. BECK
Acting United States Attorney

s/ Kathryn E. Boyles
Kathryn E. Boyles
Special Assistant United States Attorney
National Security Unit

s/ Michael C. Martin
Michael C. Martin
Assistant United States Attorney
Chief, National Security Unit

Dated: April 4, 2025

United States District Court
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number: 2:25-cr-20224**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information

Companion Case Number:

This may be a companion case based upon LCrR 57.10 (b)(4)¹:

Judge Assigned:

☐ Yes☒ No

AUSA's Initials:

KB

Case Title: USA v. Sarmad RAFI**County where offense occurred :** St. Clair**Check One:** ☒ **Felony**☐ **Misdemeanor**☐ **Petty**☐ Indictment/ ☐ Information --- **no** prior complaint.☐ Indictment/ ☒ Information --- based upon prior complaint [Case number: 25-mj-30026]☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information****Superseding to Case No:** _____**Judge:** _____☐ Corrects errors; no additional charges or defendants.☐ Involves, for plea purposes, different charges or adds counts.☐ Embraces same subject matter but adds the additional defendants or charges below:**Defendant name****Charges****Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**April 4, 2025

Date

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Attorney Bar #:

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.